

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

FELICIA S. HENDRICKS ,

Plaintiff,

VS.

2:05-CV-714-F

WARREN MCDONNELL, et al.,

Defendants.

NOTICE TO TAKE DEPOSITION

**TO: FELICIA S. HENDRICKS,
Post Office Box 251554 or
5113 LOBLOLLY PINE DRIVE
Montgomery, Alabama 36125**

Please take notice that on the 6 th day of April, 2006, the Defendants will take the deposition of Felicia S. Hendricks beginning at 10:00 a.m. at the office of the undersigned counsel for the Alabama Department of Corrections, 301 South Ripley Street, Montgomery, Alabama, before a notary public or any other officer duly authorized by law to administer oaths, and is to bring with them to said deposition the following documents:

1. Any and all written and/or tape recorded notes, memorandum, or other documents in your possession or subject to your control which supports the claims made the basis of this lawsuit.
2. All documents which the plaintiff utilized to prepare for deposition testimony or to refresh Plaintiff's recollection.
3. Copies of all medical records which are in the plaintiff's possession or control which relate to the plaintiff's medical condition or health during the period of time germane to this lawsuit.

4. Any and all tape recordings of any employee, or former employee, of the Department of Corrections or any other person who may be called to testify in this proceeding.

5. Any paperwork associated with complaints and/or grievances made and/or filed by the Plaintiff against any employee of the Department of Corrections, or relating to any adverse working condition and/or unequal treatment existing within the Alabama Department of Corrections.

6. Any and all written and/or tape recorded notes, memorandum, or other documents submitted to any office of the Equal Employment Opportunity Commission which relate in any way to the allegations raised in the complaint.

7. Each notepad and/or notes, calendars or writings used or made by this plaintiff during his employment with the Department of Corrections and which relate to the claims asserted in his complaint.

8. Any witnesses statements that you anticipate using to support your claims in the above styled cause.

9. Any notes, letters, or other documents received by you from any person that you anticipate calling as a witness in the above styled cause.

10. Any correspondence, written documents, or other papers that relate, in any way, to any purported loss of wages by you in the claims of the above style cause.

Respectfully submitted,

Kim T. Thomas (THO115)
General Counsel
Deputy Attorney General

/s/Greg Biggs (BIG004)
Greg Biggs (BIG004)
Assistant Attorney General
Assistant General Counsel

ADDRESS OF COUNSEL:

Alabama Department of Corrections
Post Office Box 301501
301 South Ripley Street
Montgomery, Al. 36130
(334) 353-3885

CERTIFICATE OF SERVICE

I hereby certify that I have on this the 16th day of March, 2006, electronically filed the forgoing document with the Clerk of the Court using the CM/ECF system and that I served a copy of the foregoing document via United States Mail, postage prepaid, first class, on :

FELICIA S. HENDRICKS,
Post Office Box 251554 or
5113 LOBLOLLY PINE DRIVE
Montgomery, Alabama 36125

/s/Greg Biggs (BIG004)
Greg Biggs (BIG004)
Assistant Attorney General
Assistant General Counsel